

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION**

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<b>In re</b>	:		<b>Chapter 11</b>
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<b>NORTHERN BERKSHIRE</b>	:		<b>Case No. 11-31114 (HJB)</b>
<b>HEALTHCARE, INC., <i>et al.</i>,<sup>1</sup></b>	:		
	:		<b>(Jointly Administered)</b>
<b>Debtors.</b>	:		
	:		
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**MOTION TO ADJOURN  
HEARING ON DEBTORS' MOTION TO APPROVE DISCLOSURE STATEMENT**

TO THE HONORABLE HENRY J. BOROFF  
UNITED STATES BANKRUPTCY JUDGE

Northern Berkshire Healthcare, Inc., on behalf of itself and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby submits this motion (the “Motion”) to adjourn the hearing on the Debtors’ Motion for an Order (i) Approving Disclosure Statement with Respect to Plan of Reorganization; (ii) Establishing Voting Record Holder Date; (iii) Approving Solicitation Procedures, Forms of Ballots, and Manner of Notice; (iv) Fixing the Deadline for Filing Objections to Confirmation of the Plan; and (v) Scheduling a Hearing on Plan Confirmation (the “Disclosure Statement Motion”) and the deadline to file any objection to the Disclosure Statement Motion (the “Objection Deadline”). The Debtors request that the hearing to approve the Disclosure Statement Motion, which is currently scheduled for January 12, 2012, at 10:00 a.m. (ET), and the Objection Deadline be adjourned to dates and times to be

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<sup>1</sup> The Debtors in these cases are Northern Berkshire Healthcare, Inc., North Adams Regional Hospital, Inc., Visiting Nurses Association and Hospice of Northern Berkshire, Inc., Northern Berkshire Realty, Inc., and Northern Berkshire Healthcare Physicians Group, Inc.

agreed at the hearing scheduled for January 12, 2012. In further support of the Motion, the Debtors respectfully represent and set forth as follows:

**Background**

1. On June 13, 2011, the Debtors filed voluntary petitions with this Court for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 et seq.
2. On September 2, 2011, the Debtors filed the Disclosure Statement Motion. A hearing to approve the Disclosure Statement Motion is currently scheduled for January 12, 2012, at 10:00 a.m. (ET).
3. On January 5, 2012, the Debtors filed the (i) Modified Second Amended Plan of Reorganization of Northern Berkshire Healthcare, Inc., North Adams Regional Hospital, Inc., Visiting Nurse Association & Hospice of Northern Berkshire, Inc., and Northern Berkshire Physicians Group, Inc. Under Chapter 11 of the Bankruptcy Code (the “Plan”) and (ii) Modified Second Amended Disclosure Statement Pursuant to Modified Second Amended Plan of Reorganization of Northern Berkshire Healthcare, Inc., North Adams Regional Hospital, Inc., Visiting Nurse Association & Hospice of Northern Berkshire, Inc., and Northern Berkshire Physicians Group, Inc. Under Chapter 11 of the Bankruptcy Code (the “Disclosure Statement”).

**Basis for Relief**

4. The Debtors respectfully request an adjournment of the hearing to approve the Disclosure Statement Motion. The Debtors have agreed to a term sheet for a plan of reorganization with their primary secured lenders. This term sheet provides that the secured lenders must consent to the treatment of the PBGC’s claims. Although the Debtors had previously negotiated a proposed resolution of the claims of the PBGC, the secured creditors have withheld consent to that treatment. The Debtors, the secured lenders, the PBGC, and the Creditors’ Committee are consequently engaged in further negotiations regarding the proposed

treatment of the PBGC, and as a result also of the proposed treatment of general unsecured creditors. These negotiations are in progress, but are not yet complete.

5. In light of the foregoing, the Debtors respectfully submit that an extension of the Objection Deadline and an adjournment of the hearing to approve the Disclosure Statement Motion from January 12, 2012 to dates and times to be agreed at the hearing scheduled for January 12, 2012, is in the best interest of the Debtors, their creditors, and all other parties-in-interest.

**Notice**<sup>2</sup>

6. No trustee or examiner has been appointed in these chapter 11 cases. The Debtors served notice of the Motion on: (i) the Office of the United States Trustee for the District of Massachusetts; (ii) counsel to the Creditors' Committee; (iii) MDFA; (iv) BONY; (v) counsel to the Master Trustee; (vi) counsel to U.S. Bank; (vii) counsel to Nuveen; (viii) counsel to ACA; (ix) the PBGC; (x) the Office of the Attorney General for the Commonwealth of Massachusetts; and (xi) all parties who have requested service of pleadings pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors submit that no other or further notice need be provided.

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<sup>2</sup> Capitalized terms used but not defined in this Notice section shall have the meanings given in the Declaration of Christopher L. Hickey in Support of Chapter 11 Petitions and First Day Motions and Applications, sworn to on June 13, 2011 [Docket No. 3].

WHEREFORE, the Debtors respectfully request that this Court (i) enter an order extending the Objection Deadline and adjourning the hearing on the Disclosure Statement Motion to dates and times to be agreed at the hearing scheduled for January 12, 2012, and (ii) grant such other and further relief as is just and proper.

Dated: Boston, Massachusetts  
January 11, 2012

Respectfully submitted,

/s/ James A. Wright III

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